

THREATENED AND ENDANGERED SPECIES	
SUMMARY COMMENT:	Commentors pointed out a naming error for the Canada lynx.
SUMMARY RESPONSE:	The proper name for the Canada lynx was used in the FEIS.
COMMENT:	Threatened and Endangered Species (page 120) Page 123, Canada Lynx: "However, remnant populations persist. Although on a broad scale this may be true, in Montana, presence of lynx has been documented in all the major habitat areas that one would expect lynx populations to exist in. To apply the qualitative assessment broadly is to imply something that may not exist at least north of YNP in Montana. To date we know of no studies that have quantified the relative abundance question in these areas, but distribution has been well documented at least in the areas north of YNP to Canada.
RESPONSE:	A correction regarding lynx distribution was made in the FEIS.
SUMMARY COMMENT:	Commentors wished to see a depiction of lynx habitat in the parks, and an expanded discussion about impacts to lynx and conservation strategies.
SUMMARY RESPONSE:	A lynx habitat map and a map of lynx observations for the three parks are included in the biological assessment published concurrently with this document. NPS is cooperating with the US Fish and Wildlife Service to develop a conservation plan for lynx, and the FEIS and the biological assessment contain a revised discussion of lynx.
SUMMARY COMMENT:	The DEIS failed to adequately discuss the impacts of snowmobiles and groomed, packed roads and trails on lynx and other species.
SUMMARY RESPONSE:	A discussion of how packed snow routes affect lynx and other species, including T&E, is included in the FEIS and the biological assessment. The discussion of impacts related to all winter use activities was expanded in the FEIS.
SUMMARY COMMENT:	Commentors were concerned about the effects of recreation during the pre- and post-denning period.
SUMMARY RESPONSE:	The FEIS (see alternative A for the complete review) and the biological assessment contain a revised discussion of grizzly bears and impacts associated with the pre- and post-denning periods.
COMMENT:	Several commentors provided additional citations or information to support their position on whether or not snowmobiling or plowing affects federally listed species.

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RESPONSE:	The FEIS contains an expanded literature review, but did not attempt to include every suggested reference. The CEQ regulations do not require exhaustive and voluminous discussion, especially when the discussion can be characterized as background and adding needless detail (§1500.4 (f)). The amount of detail to be included in an EIS should be that level which is relevant to the decision to be made, and preparing analytic as opposed to encyclopedic documents (§1500.4 (b)). The regulations recommend page limits on documents, which the FEIS already exceeds. Finally, the regulation at §1502.21 (Incorporation by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Brevity and incorporation by reference of large amounts of literature in the DEIS, and in the FEIS, does not constitute inadequate disclosure. In addition, effects on federally protected species associated with the preferred alternative are assessed in the biological assessment.
SUMMARY COMMENT:	Commentors suggested ways to improve the discussion related to wolves.
RESPONSE:	The discussion of wolves in the FEIS was revised.
COMMENT:	In a report authored by the Wyoming Game and Fish department, researcher (sic) speculate that recreational snowmobiling adversely affects the survival rate of the American Bald Eagle by disrupting nest initiation at a critical time, causing failure of egg incubation.
RESPONSE:	The initiation of nesting in the parks coincides with the decline in use of snowmobiles. See the FEIS (alternative A contains a complete review) and the biological assessment for a review of impacts to bald eagles in the parks.
COMMENT:	p. 122 Bald Eagle - Bald eagles have met their recovery criteria and are expected to be delisted in the year 2000, maybe before the ROD is signed.
RESPONSE:	This information is included in the FEIS and the biological assessment.
COMMENT:	Bald eagle nest sites in Grand Teton National Park that are in the vicinity of snowmobile use areas have been notoriously unproductive and intermittently occupied.
RESPONSE:	NPS wonders where commenter obtained this information. It is unsubstantiated.
COMMENT:	Please adequately and comprehensively evaluate the environmental impacts of snowmobiling and trail grooming on Yellowstone's threatened and endangered species, particularly the grizzly bear, the survival and viability on its beleaguered but fragile thermally influenced habitat and vegetation.
RESPONSE:	An expanded analysis of the impacts on grizzly bears associated with winter use is contained in the FEIS (see alternative A for a complete review) and the biological assessment.
SUMMARY COMMENT:	The evaluation of impacts to T&E species is inadequate.

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SUMMARY RESPONSE:	NPS disagrees that it has failed in its obligation to disclose the impacts of winter recreation on the parks' resources, including federally protected species and species of special concern. The CEQ regulations do not require exhaustive and voluminous discussion, especially when the discussion can be characterized as background and adding needless detail (§1500.4 (f)). The amount of detail to be included in an EIS should be that level which is relevant to the decision to be made, and preparing analytic as opposed to encyclopedic documents (§1500.4 (b)). The regulations recommend page limits on documents, which the FEIS already exceeds. Finally, the regulation at §1502.21 (Incorporation by reference) requires agencies to incorporate material by reference to cut down on the bulk without impeding agency review. Brevity and incorporation by reference of large amounts of literature in the DEIS, and in the FEIS, does not constitute inadequate disclosure. The commentors will find, however, additional information in the FEIS and biological assessment on the effects of winter recreation on wildlife (including federally protected species and species of special concern).
SUMMARY COMMENT:	Commentors were concerned about the effects of lengthening the winter use season on grizzly bears.
SUMMARY RESPONSE:	The potential effects of lengthening the winter use season on grizzly bears are disclosed in the FEIS.
COMMENT:	Couldn't find out if grizzlies hibernate, if not, wouldn't less noise create the possibility of more conflicts with humans?
RESPONSE:	The commenter is referred to the FEIS and the biological assessment for information on grizzly bears.
SUMMARY COMMENT:	Commentors expressed concern over the impacts of groomed and plowed roads on wolves.
SUMMARY RESPONSE:	The effects of groomed and plowed routes on wolves are discussed in the FEIS and the biological assessment.
COMMENT:	There should be a study to determine if wolf numbers should be controlled so that they do not stray outside the park boundaries and into surrounding communities and into our Bighorn Sheep herd.
RESPONSE:	Wolf management and related activities associated with the reintroduction effort are outside of the scope of the Winter Use Plan.
COMMENT:	The DEIS is severely flawed and inadequate because it fails to seriously consider a no snowmobiling, no trail grooming alternative.
RESPONSE:	It is within the discretion of the decision maker to set the range of alternatives to be considered. How can the decision maker assess the impacts of an action without considering an alternative that includes it? If there is doubt about the level or type of use that might be acceptable, relative to impacts and mandated tolerances, then how can a determination be made without an appropriate range of alternatives? NEPA requires a "no-action" alternative (§1502.14(d)). In this case, since motorized use exists, and was sanctioned in the past under existing rules, policies and plans, "no-action" is correctly interpreted as the existing management situation. CEQ directly supports this position. Its opinion is that in instances where ongoing programs are being evaluated, "no-action" is "no change" from current management direction or level of management intensity. In these instances, CEQ states: "To construct an alternative that is based on no management at all would be a useless academic exercise (Question 3 of CEQ 40 Most-Asked Questions).

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SUMMARY COMMENT:	NPS failed to adequately disclose and assess impacts to T&E species on adjacent lands.
SUMMARY RESPONSE:	Potential cumulative impacts to T&E species associated with winter recreation are more fully discussed in the FEIS (see “adjacent lands”) and biological assessment. Input from cooperators is necessary for the NPS to formulate a comprehensive analysis on areas of concern outside the parks.
COMMENT:	It also should be noted that the settlement agreement requires the NPS to prepare a biological assessment and to request formal consultation with the U.S. Fish and Wildlife Service. In addition, as a reminder, the NPS must make its biological assessment available to the public upon completion. Since the NPS has not released its assessment, it is assumed that the assessment has not been completed.
RESPONSE:	A Biological Assessment (BA) of the final preferred alternative was submitted to the USFWS in a timely manner and is available for public review. Because the preferred alternative identified in the DEIS was subject to review and possible change, a BA was not submitted concurrently with the DEIS, nor was NPS required to do so. Furthermore, it is up to the USFWS to determine if formal consultation needs to occur based on whether or not adverse effects are expected under the preferred alternative.
COMMENT:	While direct snowmobile impacts on grizzlies are limited due to grizzly denning during the peak period of snowmobile use, it is now clear that indirect impacts may adversely affect grizzlies in the Parks. Indirect impacts result from the altered distribution and movement patterns of large ungulates, particularly bison and elk, caused by snowmobile trail use and the consequent availability of carrion.
RESPONSE:	The NPS does not dispute that carrion is important to grizzly bears in the spring. However, it is NOT clear, as the commenter asserts, that indirect impacts associated with the alleged “altered distribution and movement patterns of large ungulates” result in lowered availability and accessibility of carrion.
COMMENT:	Air pollution impacts to Park vegetation may be another indirect effect of snowmobile use on grizzlies. These impacts may affect all components of the food chain, including grizzly bears and other threatened and endangered species, as a result of bioaccumulation of toxins in Park herbivores (See Shaver et al, 1988). In the parks, however, little research into such affects has been conducted.
RESPONSE:	The potential indirect effects of air pollution on grizzlies are not supported by data and are consequently highly speculative.
SUMMARY COMMENT:	The amount of carrion available to grizzlies in the spring is significantly reduced because animals die near groomed trails which are avoided by grizzly bears.
SUMMARY RESPONSE:	Although some studies have indicated that grizzlies use carrion within 1.5 km of a road or development less than its availability, there has not been shown a causal link between roads, where animals die, and grizzly bear survival as influenced by lack of carrion. Any disturbance to scavenging bears as a result of roads and developments are alleviated by a YNP policy that closes to the public important spring foraging habitats for grizzlies beginning March 15 (before the majority of bears emerge from their dens). This discussion will be expanded upon in the FEIS and BA.

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SUMMARY COMMENT:	General expressions of support for or in opposition to: grooming; snowmobiles; snowcoaches; plowing; regulating backcountry use; the number of visitors, and mass transit.
SUMMARY RESPONSE:	Comments noted. Expressions of support or objection will be responded to when the decision criteria are developed, and accordingly, when the rationale for the decision is presented in the Record of Decision. People who commented in this fashion are asked to consider that there is a very clear separation between alternatives legitimately considered in an analysis and the expression of a preferred alternative or the decision to be made.
COMMENT:	Although the DEIS notes that winter recreation use along road corridors may cause eagle avoidance of prime nesting habitat, the preferred alternative provides little in the way of mitigation. In GTNP, nests are only protected as discovered (page 122) and no proactive steps are taken to protect this species.
RESPONSE:	The biological assessment to be published concurrently with the FEIS contains a lengthy discussion and analysis of bald eagles, including mitigation measures. This information will be included in the FEIS as well.
COMMENT:	The primary effect of winter use in Yellowstone on grizzly bears is on the bison that are potential prey for grizzly bears. As mentioned above, bison use the packed trails to leave the park, and under the current management policy many of them are killed at the park border, thus lost to the bears as a potentially important food item. The Winter Use EIS fails to address this problem in its analysis, and its preferred alternative might only exacerbate this problem, since a plowed road would make for an even easier travel corridor than a packed trail, and the implementation of mass transit would result in reduced displacement of bison from the park roads.
RESPONSE:	In response, NPS asserts that there is no evidence to suggest that bison use of plowed roads would differ from their use of groomed roads, and that overall, use of groomed or plowed roads is minimal (Bjornlie 2000, Kurz et al. 2000). Instead, bison were described as traveling on their own, well-established network of trails, usually in riparian corridors or geothermally influenced areas. Mass transit, as proposed under alternative B, would serve to <u>decrease</u> the amount of traffic, and thus would <u>lessen</u> any associated displacement impacts to bison.
COMMENT:	Several comments were received that pertained to the effects of various winter activities on grizzly bears, including noise, disturbance, snowmobiling, plowed and groomed roads, the availability of carrion, and the length of the winter use season.
RESPONSE:	Because the majority of grizzly bears are not active during the peak season of snowmobile use, and data does not exist that indicates dened bears are disturbed by snowmobile noise, noise is not considered to be an impact on bears. In regards to the other issues, readers are asked to refer to the FEIS and the biological assessment for an expanded discussion of the effects of winter recreation on grizzly bears.

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<p>COMMENT: Another issue regarding grizzly bears that has not been adequately addressed in the DEIS is the increased use of carrion by bears over the winter. Due to the presence of wolves, and the carrion they provide, grizzly bears are beginning to make significant changes in their winter habits. Already we've seen a few bears delay hibernation, bears emerge during the winter to utilize wolf kills, and other bears emerging earlier in the spring. As bears learn about the presence and certainty of finding wolf-killed carrion, they will be seen more and more often during the winter months. Throughout the DEIS there is a tendency to dismiss the problems of bear management during the traditional hibernation period. We believe that the Park Service, in its Winter Use Plan needs to plan ahead to the human impact to bears that choose to emerge during the winter.</p>
<p>RESPONSE: This comment refers to Glacier National Park where a few bears have scavenged on carcasses provided by wolves and mountain lions during the winter. To date, no conflicts with humans have resulted from this activity. In the GYA, grizzly bears have not been documented to exhibit this behavior.</p>
<p>SUMMARY COMMENT: Commentors were concerned about off-trail snowmobile use and how it might affect denning grizzly bears.</p>
<p>SUMMARY RESPONSE: NPS enforces the regulation that requires snowmobiles to stay on roads and designated routes to the best of its availability. Impacts of snowmobiles on denning bears may be more of an issue on US Forest Service lands where snowmobile use is largely unrestricted outside of wilderness and winter range closures. The FEIS and biological assessment contain information on the effects of snowmobiles on denning bears on adjacent lands.</p>
<p>COMMENT: Snowmobiles are a threat to grizzly bears. The primary problem for grizzly bears comes as the use of snowmobiles increases in the Greater Yellowstone Ecosystem after bears have emerged from their dens, approximately in mid-April. Snowmobiling is becoming increasingly popular as spring conditions create more stability for snowmobilers. Expanding snowmobiling use also increases pressure for "shoulder season" development, which also puts additional stress on grizzlies at key times of the year. The future of grizzly bears is severely threatened in the Greater Yellowstone Ecosystem and the survival of the grizzly bear is in jeopardy which is one more reason that snowmobiling should be banned in Yellowstone and Grand Teton National Parks and in the John D. Rockefeller Parkway.</p>
<p>RESPONSE: The Winter Use Plan only pertains to the winter use season in the parks, which ends by mid-March.</p>
<p>COMMENT: Lynx are very sensitive to disturbances and will move their dens when cross-country skiers or snowmobilers come close to where they're raising their young.</p>
<p>RESPONSE: The winter use season in the parks does not overlap with the denning period for lynx. See the FEIS and biological assessment for a discussion of lynx.</p>